

SO. CAL. EQUAL ACCESS GROUP
Jason J. Kim (SBN 190246)
Jason Yoon (SBN 306137)
101 S. Western Ave., Second Floor
Los Angeles, CA 90004
Telephone: (213) 205-6560
cm@SoCalEAG.com

Attorneys for Plaintiff
NELSON CHILIN

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NELSON CHILIN,
Plaintiff,

vs.

780 S ROCHESTER PROPERTY
MANAGEMENT, INC.; and DOES 1 to
10,
Defendants.

Case No.: 5:25-cv-00843-DTB

**Plaintiff's Notice of Motion and Motion
for Default Judgment by Court**

Date: August 14, 2025
Time: 10:00 a.m.
Courtroom: 4, 3rd Floor

Honorable Judge David T. Bristow

To Defendant 780 S ROCHESTER PROPERTY MANAGEMENT, INC., and the attorneys of record, if any: Please take notice that on August 14, 2025, at 10:00 a.m., or as soon thereafter as this matter may be heard by this Court located at 3470 Twelfth Street, Riverside, California, Plaintiff NELSON CHILIN will present Plaintiff's motion for default judgment against Defendant 780 S ROCHESTER PROPERTY MANAGEMENT, INC.. The Clerk has previously entered the default on said Defendant on May 23, 2025 (Dkt. #10).

At the time and place of hearing, Plaintiff will present proof of the following matters: (1) Defendant 780 S ROCHESTER PROPERTY MANAGEMENT, INC., is not

1 a minor or an incompetent person or in military service or otherwise exempted under the
2 Soldier and Sailor's Civil Relief Act of 1940; (2) Defendant 780 S ROCHESTER
3 PROPERTY MANAGEMENT, INC., has not appeared in this action; and (3) Plaintiff is
4 entitled to judgment against said Defendant on account of the claims pleaded in the
5 complaint, to wit: a violation of the Americans with Disabilities Act, the Unruh Civil
6 Rights Act, the California Disabled Persons Act, the California's Unfair Competition Act,
7 and Negligence.

8 The Plaintiff seeks a judgment in the amount of \$4,000.00 in statutory damages,
9 \$2,285.00 in attorney's fees, and \$785.00 in costs as set forth in the attached Declaration
10 of Jason J. Kim and an Order directing the Defendant to: make alterations in such a
11 manner that, to the maximum extent feasible, the goods, services, facilities, privileges,
12 advantages, or accommodations offered by Defendant are readily accessible to and usable
13 by individuals with disabilities at the property located at or about 780 S. Rochester Ave.,
14 Ontario, California. This motion is based on this notice, the declarations submitted in
15 support of this motion, and other matters which may be presented at the hearing.

16 Notice of the original motion for default judgment by court was served on
17 Defendant 780 S ROCHESTER PROPERTY MANAGEMENT, INC., on July 16, 2025,
18 by first class United States Mail, postage prepaid.

19
20 Dated: July 16, 2025

SO. CAL. EQUAL ACCESS GROUP

21
22
23 By: /s/ Jason J. Kim
24 Jason J. Kim, Esq.
25 Attorneys for Plaintiff
26
27
28